

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:)
WILLIAM A. BROWNLEE, SR.,)
)
DEBTOR.)
)
AMERICAN AIRLINES FEDERAL)
CREDIT UNION)
)
CREDITOR)
)
WILLIAM A. BROWNLEE, SR., DEBTOR,)
AND KENNETH E. WEST, TRUSTEE)
)
RESPONDENTS)

CASE NO.: 24-10598-pmm

CHAPTER 13

JUDGE PATRICIA M. MAYER

OBJECTION TO CONFIRMATION OF PLAN

COMES NOW, American Airlines Federal Credit Union, (“Secured Creditor”) by and through its undersigned attorneys, and for its Objection to Confirmation of Debtors Chapter 13 Plan, herein states and alleges as follows:

1. This Court has exclusive jurisdiction over this proceeding. Debtor filed this Petition under Chapter 13 of the United States Bankruptcy Code on or about February 23,2024.
2. Secured Creditor holds a lien over Debtor’s property described as a **2021 Maserati Levante, I.D. No. ZN661XUA6LX352481.**
3. As of the petition date, Secured Creditor’s estimated secured claim is \$48,791.81 and the underlying loan matures on October 20, 2028. Secured Creditor will file its Proof of Claim by the bar date of May 3, 2024, with the approximate claim amount of \$51,128.20, which is above the claim amount of \$43,200.00 being paid at 0.00% listed on Debtor’s Plan.
4. Therefore, the plan fails 11 U.S.C. §1322 (b)(2)-(3), and pursuant to 11 U.S.C. §1325 (a)(5) the plan cannot be confirmed.

WHEREFORE American Airlines Federal Credit Union prays that its Objection to Confirmation of Plan be sustained, and for all further relief as is just and proper.

Respectfully submitted,

/s/ Joshua I. Goldman
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Counsel for Creditor

CERTIFICATE OF SERVICE

I hereby certify that on or before April 30, 2024, I caused a true and correct copy of the foregoing to be served either by CM/ECF notice to those so authorized, and first-class mail as indicated to the parties reflected on the attached.

DEBTOR

WILLIAM A. BROWNLEE, SR
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DEBTORS COUNSEL

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TRUSTEE

KENNETH E. WEST
OFFICE OF THE CHAPTER 13 STANDING TRUSTEE
1234 MARKET STREET - SUITE 1813
PHILADELPHIA, PA 19107

U.S. TRUSTEE

UNITED STATES TRUSTEE
OFFICE OF UNITED STATES TRUSTEE
ROBERT N.C. NIX FEDERAL BUILDING
900 MARKET STREET, SUITE 320
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Respectfully submitted,

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